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18 *Trucking, Inc. and Bell Rose Capital, Inc.*

19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA**
21 **EASTERN DIVISION**

22 SALGADO FAMILY TRUCKING,
23 INC., a California corporation, and
24 BELL ROSE CAPITAL, INC., a
25 Wyoming corporation,

26 Plaintiffs,

27 v.

28 PAUL KHAN, an individual, JOEL
TOMBRAN, an individual, STEPHEN
TAUB, an individual, and BRANALEX
FINANCIAL GROUP, INC., an
Ontario corporation,

Defendants.

CASE NO. 5:22-CV-01019-RGK-KKx

**NOTICE OF MOTION FOR
EXTENSION OF TIME IN WHICH
TO FILE PROOFS OF SERVICE,
OR ALTERNATIVELY, TO FILE
DISMISSAL OF ACTION**

Date: December 5, 2022

Time: 9:00 AM

Courtroom: 850

Judge: Hon. R. Gary Klausner

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE: On December 5, 2022, at 9:00 AM, or as soon thereafter as may be heard, in the United States District Court for the Central District of California, Courtroom 850, located at 255 East Temple Street, Los Angeles, CA 90012, 8th Floor, Plaintiffs Salgado Family Trucking, Inc. and Bell Rose Capital, Inc. will, and hereby do, move this Court for an extension of time of sixty (60) days from today's date in which to file proofs of service of the Defendants or, alternatively, to file a dismissal of this entire action pursuant to an executed settlement agreement as to which certain required post-execution actions have not yet been completed.

This motion is based upon this Notice of Motion; the attached Memorandum of Points and Authorities; Declaration of Thomas D. Mauriello and supporting exhibits; the Court's records and files in this action; and such further argument and evidence as the Court may hear.¹

DATED: November 2, 2022

/s/ Thomas D. Mauriello

MAURIELLO LAW FIRM

PAESANO AKKASHIAN APKARIAN, PC

*Attorneys for Plaintiffs Salgado Family
Trucking, Inc. and Bell Rose Capital, Inc.*

¹ Additionally, Plaintiffs expect to file shortly an *ex parte* application for order shortening time for hearing this Motion.